

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION**

BRANDON LIVAS, RICHARD BUSWELL,  
DEWAYNE CORBETT, JOHNNY SMITH,  
CARLOS LORENZO MARTIN, and  
GAINES ANDREWS, on behalf of  
themselves and those similarly situated,

*Petitioners,*

v.

RODNEY MYERS, warden of Oakdale  
Federal Correctional Institutions; and  
MICHAEL CARVAJAL, Federal Bureau of  
Prisons Director, in their official capacities,

*Respondents.*

**Case No. 2:20-cv-00422**

**Judge Terry A. Doughty  
Magistrate Judge Kathleen Kay**

**Class Action**

**IMMEDIATE RELIEF SOUGHT**

**NOTICE OF SUPPLEMENTAL EVIDENCE**

NOW INTO COURT, through the undersigned counsel, come Petitioners, who file this notice of supplemental evidence in support of their Motion for Preliminary Injunction. As this Court is aware, the situation at FCI Oakdale is rapidly evolving, and conditions within the prison are changing every day. Petitioners seek to supplement the record with declarations and/or affidavits of incarcerated persons and their relatives, as well as declarations of counsel, medical and academic authorities.

As this Court's April 16, 2020, minute entry instructed, "If the parties wish to submit any additional evidence, including affidavits or declarations, they must file the supplemental evidence no later than Wednesday, April 22, 2020, by 5:00 p.m." Dkt. 15 at 2. Petitioners submit the attached supplemental evidence to provide the Court with current, relevant information to assist with and inform consideration of the instant Motion for Preliminary Injunction at tomorrow's scheduled hearing.

Attached hereto are copies of the following materials:

Ex. 1: Declaration of Dr. Joe Goldenson

Ex. 2: Declaration of Dr. Nina H. Fefferman

Ex. 3: Curriculum Vitae of Dr. Nina H. Fefferman

Ex. 4: Declaration of Chandler Ingersoll

Ex. 5: Declaration of Dewayne Corbett

Ex. 6: Declaration of Donald Cain

Ex. 7: Declaration of Hilda Hooten

Ex. 8: Declaration of Ernestine Vargas

Ex. 9: Declaration of Carey Moore

Ex. 10: Declaration of Bruce Hamilton

Respectfully submitted this 22nd day of April, 2020.

Respectfully submitted by:

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*\*pro hac vice applications forthcoming*

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2020, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

I further certify that copies of all pleadings and other papers filed in the action to date or to be presented to the Court at the hearing, have been furnished to the Defendants' attorneys, who have already made an appearance in this matter.

/s/ Bruce Hamilton

Bruce Hamilton, La. Bar No. 33170